

**2024 Risk Management Working Group
Creative Commons Open Culture Platform**

RISK MANAGEMENT TOOLKIT

**Risk Mitigation in Open Access to
Digital Cultural Heritage Collections**

Authored by:
Ilkay Holt (WG co-lead)
Revekka Kefalea (WG co-lead)

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*Risk Management Toolkit:
Risk Mitigation in Open Access to Digital Cultural Heritage Collections*

Authors

Ilkay Holt and Revekka Kefalea
WG co-leads

WG Members

Issahaku Tidoo Abass, Olubusola Afolabi, Khali Allahmagani, Mohammed Awal Awal, Maxwell Beganim, René Bile, Ester Cornelio, Ruby Damenshie-Brown, Christina Haule, Edward Jacobo, Crispin Ngakani, Ngozi Perpetua Osuchukwu.

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1. Introduction

This [Risk Management Toolkit](#) has been created by the Risk Management Working Group of the [Creative Commons Open Culture Platform](#), which was formed in May 2024 to support the Platform's vision of **"Moving 25 Institutions to Open"**. While other members of the Platform community worked on creating a policy template, conducting outreach, and providing a guide for identifying which collection items to openly license first, the Risk Management Working Group focused on identifying risks associated with making digital collections openly accessible, and providing practical guidance on mitigating these challenges. The overarching goal was to shift from cautious, risk-averse practices to embracing open norms within the open culture community and beyond.

Alongside the toolkit, the Working Group conducted a literature review, carried out an online survey between May and August 2024, and compiled a list of use cases documenting various risk scenarios. These activities informed both the toolkit and the final report of the Working Group, ensuring a comprehensive approach to supporting institutions in their transition to openness.

1.1. The "Moving 25 Institutions to Open" vision

The [Creative Commons Open Culture Platform](#), coordinated by the [CC Open Culture Programme](#), is on a bold mission: to inspire and support cultural heritage institutions worldwide in adopting open access policies and practices. Guided by [the vision of moving 25 institutions or collections to open access by the end of 2025](#), the Platform is leveraging its diverse network of advocates, activists, and experts to foster meaningful collaboration and build capacity across the [GLAM \(Galleries, Libraries, Archives, and Museums\) sector](#).

To support this visionary goal, this Risk Management Toolkit has been designed as a comprehensive but dynamic guide, collecting and curating resources and inspiring practices to help mitigate risks associated with opening access to digital cultural heritage collections.

1.2. How does the toolkit support this vision?

The move to open is not without challenges. Concerns about copyright compliance, privacy protection, ethical representation, financial sustainability, and technical limitations often deter institutions from embracing openness. These barriers are particularly pronounced for under-resourced and under-represented institutions, which the CC Open Culture Platform is prioritizing in its efforts to enhance global diversity in open collections.

This toolkit responds directly to these challenges by:

- highlighting key risks identified through insights from a literature review and an online survey;
- presenting actionable strategies to address or prevent these risks;
- curating a comprehensive list of practical tools and resources to effectively implement these strategies; and

- offering use case scenarios and templates to be adapted for diverse institutional needs.

The toolkit aligns with the Platform's broader goal of creating a global community of practice that facilitates knowledge exchange, and equips institutions with the tools they need to confidently share their collections with the world.

1.3. Who is this toolkit for?

The Risk Management Toolkit can be useful to GLAM professionals and volunteers working in memory institutions or community heritage initiatives, interested in open culture, and responsible for digitising, curating, cataloguing and making digital cultural heritage collections available to the public. GLAM professionals and volunteers include but are not limited to:

- digital archivists,
- librarians,
- collection managers,
- digitization specialists,
- technicians,
- metadata specialists,
- rights and reproductions managers,
- copyright officers,
- preservation specialists,
- project managers,
- digital content curators.

1.4. How to use this toolkit?

- Browse risk areas, and learn more about key challenges, mitigation strategies, practical tools and resources, and inspiring good practices.
- Follow the recommended strategies and selected practices to manage risks effectively in your organization's open access programme.
- Explore use cases in each risk area to see if any of them applies to your local context, or visit the "Use cases" section to see the complete list by collection type.
- Revise and adapt the provided templates so as to use them for your specific needs and requirements.
- Check out useful related resources to deepen understanding and knowledge of risk management in open access initiatives.

1.5. Open invitation to contribute

If you have any suggestions to improve the toolkit content, please get in touch by [contacting](#) the 2024 Working Group co-leads, Ilkay Holt and Revekka Kefalea. We would appreciate your help in making the toolkit more inclusive by incorporating diverse resources, use cases and policy templates, representing a broader range of communities from different regions.

2. Risk areas

2.1. Legal: Copyright and privacy considerations

Based on findings from the literature review and online survey conducted by the Working Group, GLAM institutions reported facing significant legal challenges, particularly in determining copyright ownership and ensuring compliance with copyright laws. Concerns were frequently raised about the potential misuse of open access materials and the risk of infringements due to incorrect licensing. Additionally, many institutions noted the complexities of managing copyrighted materials they do not own, emphasizing the need for cautious handling to avoid legal complications.

"We aren't always the copyright holders on all works and/or their reproductions. In other cases, we manage the digital reproductions but are not the owner of the underlying works."

Non-profit organisation, Belgium.

Below, you will find the key legal risks identified, actionable strategies to mitigate these risks, tools to support the implementation of the recommended actions, and good practices to get inspired.

2.1.1. Key risks

- Compliance with copyright laws, particularly regarding works with ambiguous ownership or uncertain copyright status.
- Protection of sensitive personal information found within collection records, such as donor details and subject data.
- Adherence to third-party terms of service for platforms or tools used to host or share collections.

2.1.2. Mitigation strategies

- **Conduct a copyright and rights audit:** Review the collection to determine copyright status, ownership, and rights holders for each item. This ensures that items shared online are legally compliant.
- **Implement clear licensing:** Apply standard copyright licenses and reuse status labels carefully, ensuring accurate attribution and clear usage guidelines to minimize the risk of misuse.
- **Provide copyright training for staff:** Ensure that team members involved in digitizing and licensing are well-versed in copyright and licensing principles to avoid potential infringements.
- **Develop infringement response protocols:** Establish protocols to handle copyright claims or misuse reports promptly and transparently.
- **Safeguard privacy:** Identify and protect personal and sensitive data within the collection records, ensuring that any personal information (such as names or contact information of donors or subjects) is either anonymized or redacted before public sharing.

- **Review third-party terms of service:** Regularly review and ensure compliance with the terms of service of any third-party platforms or digital tools used for hosting, sharing, or distributing collections.

2.1.3. Tools and resources

- **Rights statement generators:** Tools like those from [Creative Commons](#) or the [Rights Statements Consortium](#) can help generate clear and machine-readable [CC licenses](#) or [Rights Statements](#) based on each item's copyright and reuse status.
 - [Creative Commons License Chooser](#)
 - Europeana's Guide - [How to select an accurate rights statement](#)
 - [Rights Statements](#) - 3 categories, 12 different Rights Statements
 - GLAM-E Lab's Handbook: [Selecting an Alternative Label or Licence](#)
- **Legal and privacy compliance templates:** Use standardized checklists and templates for copyright clearance, permissions, licensing agreements, and privacy notices to ensure consistency across the collections.
 - Naomi Korn Associates's [Copyright Rights Clearance Checklists](#)
 - Naomi Korn Associates's [Creative Commons Licences: A Guide to Data Protection & Copyright](#) (including checklists and templates)
 - GLAM-E Lab's [Copyright Clearance Handbook for Public Domain Publications of Digital Collections](#)
 - GLAM-E Lab (2024) [Copyright Clearance Log](#).
 - [Simplified flowchart for licensing in the context of Brazil](#)
- **Copyright training for GLAM professionals:**
 - [Creative Commons Certificate Programme](#) - Open Culture/GLAM section ([Certificate resources](#))
 - [How to identify and clear copyright in collection items](#) - This page by Europeana shares training to help GLAM professionals to determine if, and which rights exist in their GLAM institution collection items. It is the first of three blocks of training, followed by [Training on the available rights statements](#) used by Europeana and [Training on how to select an accurate rights statement](#).

2.1.4. Good practices

- **Stay updated with good practices:** Follow organizations and initiatives like [Creative Commons](#), [Europeana](#), [OpenGLAM](#), and [GLAM Wiki](#) to stay updated with open access guidelines.
- **Create user guidelines for open content:** Provide clear guidelines on how users may interact with open access collections, respecting legal and ethical boundaries.
 - [Public Domain Guidelines](#) - Use guidelines, information-only draft on CC Wiki
- **Build a community of practice:** Join forums and networks with other GLAM institutions to share experiences, insights, and risk management strategies.
 - Become a [member](#) of the [Creative Commons Open Culture Platform](#), where you can be added to the mailing list, and can join regular meetings and work together on collaborative projects to further Open Culture.

2.2. Ethical and cultural sensitivities

Based on findings from the literature review and online survey conducted by the Working Group, the ethical handling of sensitive collections, particularly those related to Indigenous cultural heritage, emerged as a significant concern. Institutions emphasized the importance of culturally sensitive protocols to manage public access, ensuring respect for community ownership, self-image rights, and ethical representation within digital spaces.

"Our images of our collection appear on foreign websites who use it for their products. We also do not want our images to be used with misleading/incorrect information."

Museum, United Kingdom

Below, you will find the key ethical risks identified, actionable strategies to mitigate these risks, tools to support the implementation of the recommended actions, and good practices to get inspired.

2.2.1. Key risks

- Ethical issues regarding culturally sensitive materials, especially Indigenous cultural heritage.
- Risks of misrepresentation or disrespect to communities connected to the collections.

2.2.2. Mitigation strategies

- **Community consultations:** Engage with communities to gain insights into how materials should be represented and shared.
- **Develop sensitivity protocols:** Establish protocols for handling sensitive content, including restrictions on certain types of usage or visibility if requested by communities.
- **Implement cultural guidance in metadata:** Incorporate metadata tags to indicate culturally sensitive content, and recommended use practices, enhancing respectful interaction with the material.
- **Provide ethical training for staff:** Ensure team members understand ethical considerations around cultural heritage and the importance of cultural protocols.

2.2.3. Tools and resources

- **Cultural protocol guidelines:** Available through consultations with communities, offering guidance on ethically managing cultural collections.
 - [CARE Principles for Indigenous Data Governance](#)
 - [Ethical Sharing Card Game](#) by the Ethics of Open Sharing Working Group of the Creative Commons Open Culture Platform for navigating ethical considerations.
 - General guide on how to play the game available on this [Medium article](#).

- Webinar: [Ethics of Open Sharing with Creative Commons & Wiki Loves Living Heritage](#)
 - Anderson, J. (2006), [Cultural Protocols: A Framework](#), Australian Institute of Aboriginal and Torres Strait Islander Studies (including a protocol template for a digital archive, pp. 28-31).
 - Janke, T. (2029) [Protocols for Using First Nations Cultural and Intellectual Property in the Arts](#), Australia Council for the Arts
 - [The Aboriginal and Torres Strait Islander Protocols for Libraries, Archives and Information Services](#)
 - [ENRICH: Equity for Indigenous Research and Innovation Coordinating Hub](#)
 - First Nations Information Governance Centre: [The First Nations Principles of OCAP](#)
 - [Indigitization Toolkit](#)
 - ARIPO: African Regional Intellectual Property Organization (2010) [Swakopmund Protocol on the Protection of Traditional Knowledge and Expressions of Folklore](#).
- **Recommendations for Holocaust Material Evidence and Testimony:** Available by the [Digital Holocaust Memory Project](#) (most recent work: [Landecker Digital Memory Lab](#))
 - Recommendations for Digitising Material Evidence of the Holocaust (available [here](#) and [here](#)).
 - Recommendations for Digitally Recording, Recirculating and Remixing Holocaust Testimony (available [here](#) and [here](#)).
- **Sensitivity labeling in metadata:** Use labels to flag sensitive items and guide users on appropriate use.
 - [Traditional Knowledge \(TK\) Labels](#) by Local Contexts
 - Collections Trust's [Decolonising the Database](#) resources
- **Open source collection management systems:** There are options for managing and sharing digital collections ethically.
 - [Mukurtu CMS](#) – free, mobile, and open source platform built with Indigenous communities to manage and share digital cultural heritage

2.2.4. Good practices

- The Museums Association's [Code of Ethics for Museums](#)
- The Museum Association's [page of case studies and scenarios on everyday ethics](#)
- The Archives and Records Association's [Code of Ethics](#)
- The Oral History Society's [legal and ethical guidance](#)
- Local Contexts - [Labels](#) and [notices](#) in use
- [The He Korahi Māori Framework at Auckland Museum](#)
- [The Teu Le Vā Framework at Auckland Museum](#)
- [Indigenous Archives Collective](#)
- [Indigenous Digital Archive](#)
- [The Mukurtu Showcase](#)

- Native-Land.ca – web-based resource created in 2015 by Victor Temprano (and now a part of Native Land Digital) to draw attention to the importance of land and territories and the histories of colonization that have systematically dispossessed Indigenous peoples of their land.
- Palestine Open Maps – Developed by Ahmad Barclay, Majd Al-shihabi, Hanan Yazigi, Morad Taleeb, Henry Zaccak, and Bassam Barham, Palestine Open Maps is a platform that uses maps and data to retrace the transformation of human and natural geography in Palestine.
- Plateau Peoples' Web Portal – a collaboration between the Spokane Tribe of Indians, the Confederated Tribes Of The Colville Reservation, the Confederated Tribes of the Umatilla Indian Reservation, the Coeur d'Alene Tribe of Indians, the Confederated Tribes of Warm Springs, the Confederated Tribes and Bands of the Yakama Nation, The Confederated Salish and Kootenai Tribes of the Flathead Reservation, the Nez Perce Tribe, the Center for Digital Scholarship and Curation and Native American Programs at Washington State University. The Portal aggregates cultural materials from multiple repositories that have been chosen and curated by tribal representatives.
- The Clark Art Institute in Williamstown, Massachusetts issued a [statement](#) disapproving the reuse of Jean-Léon Gérôme's painting "Slave Market" (1866) by the German right-wing party Alternative für Deutschland (AfD), while still enacting an Open Access policy, allowing for any reproduction of a public domain work to be downloaded high-resolution for free, as expressed in their [FAQ page](#).

2.3. Technical: Technological and operational limitations

Findings from the literature review and online survey carried out by the Working Group reveal that many institutions face significant resource limitations, both in staffing and technological infrastructure, which hinder their ability to digitize and manage open access collections. Challenges such as inadequate metadata, insufficient procedural workflows, and technical vulnerabilities were commonly cited as barriers to effectively securing and maintaining accessible digital collections.

"Open datasets must be refined from all personal and institutional secret information before publishing. Unrefined datasets will compromise technical-system vulnerabilities (e.g. IP and digital address info). Last but not least, wrong-indexed datasets may cause plagiarism."

Research Institution, Turkey

Below, you will find the key technical risks identified, actionable strategies to mitigate these risks, tools to support the implementation of the recommended actions, and good practices to get inspired.

2.3.1. Key risks

- Limited resources for digitization and open access management.
- Challenges with metadata quality and technological infrastructure.
- Vulnerabilities in securing and maintaining digital collections.

2.3.2. Mitigation strategies

- **Streamline metadata practices:** Develop a standardized metadata framework to improve data quality and searchability, even with limited resources.
- **Use open-source software or third-party platforms:** Where budget constraints exist, consider open-source solutions or third party platforms (such as [Flickr Commons](#) and [Wikimedia Commons](#)) for managing and displaying digital collections.
- **Allocate staff roles for digital collections:** Designate specific staff or train existing personnel to manage open access collections, even if as a shared responsibility.
- **Regular security audits:** Schedule regular reviews of digital infrastructure to identify and address technical vulnerabilities.

2.3.3. Tools and resources

- **Open source collection management systems:** There are options that offer cost-effective solutions for managing digital collections.
 - [Access to Memory \(AtoM\)](#) - web-based, open source application for standards-based archival description and access in a multilingual, multi-repository environment
 - [Omeka](#) - open-source web publishing platforms for sharing digital collections and creating media-rich online exhibits
 - [CollectionSpace](#) - web-based, open-source collections management software for cultural heritage organizations, museums & more
 - [Tainacan](#) - open source, flexible and powerful repository platform for creating digital archives in WordPress
- **Metadata standards and principles:** Using consistent metadata standards and principles aids in interoperability and usability of online collections.
 - [FAIR principles](#)
 - [Dublin Core](#)
 - [International Image Interoperability Framework \(IIIF\)](#)
 - GLAM-E Lab (2024) [Image and Metadata Handbook for Wikimedia Commons](#).
 - GLAM-E Lab (2024) [Sandbox Template for Wikimedia Commons Metadata Management](#).

2.3.4. Good practices

- [Tainacan Showcase](#)
- [Flickr Commons Members](#)
- [Partial list of the GLAM-Wikimedia collaboration projects](#)

2.4. Financial constraints and monetization risks

Insights from the literature review and online survey conducted by the Working Group highlight that financial challenges heavily influence institutions' decisions to adopt open access practices. Concerns about potential revenue loss, particularly for those relying on licensing and sales, were frequently cited. Additionally, the costs associated with implementing and sustaining open access initiatives further restrict the capacity of some institutions to make their materials publicly accessible.

"We prefer to maintain copyright on the images of our collections as use of images is one of our few income streams."

Museum, United Kingdom

Below, you will find the key financial risks identified, actionable strategies to mitigate these risks, tools to support the implementation of the recommended actions, and good practices to get inspired.

2.4.1. Key risks

- Potential revenue loss due to open access business models.
- Financial burden of digitization, licensing, and maintaining open access infrastructure.

2.4.2. Mitigation strategies

- **Apply for grants:** Explore funding opportunities dedicated to digitization and open access projects, which can help alleviate financial pressure.
- **Engage in partnerships:** Collaborate with other institutions to share resources, reduce costs, and broaden reach.
- **Explore low-cost digitisation ideas:** Digitise with smartphones; pilot the work with a small collection; use free platforms to publish materials for any reuse purpose, and low-cost platforms to publish materials with rights restrictions; coordinate a volunteer network to digitise materials; digitise on demand for a small fee.

2.4.3. Tools and resources

- **[CC Toolkit for Business](#):** A set of resources to allow professional individuals and organizations understand why the use of CC licenses can be a strategic instrument to consider in their business models.
- **Grant databases:** Various platforms provide information on available grants for cultural heritage institutions.
- McCarthy, D. (2024). Balancing access and income – the dilemma of museum image licensing. Zenodo. <https://doi.org/10.5281/zenodo.13371244>.

2.4.4. Good practices

- Pekel, J. (2014) [Democratising the Rijksmuseum](#), Europeana Foundation.
- Pekel, J. (2015) [Making a Big Impact on a Small Budget: How the Livrustkammaren och Skoklosters slott med Stiftelsen Hallwylska museet \(LSH\) Shared their Collection with the World](#), Europeana Foundation.
- Valeonti, F., Hudson-Smith, A., Terras, M. et al. (2018) [Reaping the Benefits of Digitisation: Pilot study exploring revenue generation from digitised collections through technological innovation](#), conference presentation.
- Valeonti, F., Terras, M., Hudson-Smith, A., Zarkali, C. (2019) [Examining Mobile Print-on-Demand as an Alternative to Image Licensing for Monetising Digitisation to Promote OpenGLAM](#).

2.5. Policy and risk mitigation development

Findings from the literature review and online survey carried out by the Working Group showcase that few institutions have comprehensive policies in place to address risks associated with open access, such as data misuse, ethical considerations, and copyright breaches. Respondents emphasized the need for clearer policies and procedural workflows to manage these challenges effectively, and minimize the risks of harm or misrepresentation.

"We are not placing all our collections out there to be available due to lack of procedural workflow in obtaining permissions to digitize and display collection items. This is a missed opportunity."

Library, United States of America

Below, you will find the key policy risks identified, actionable strategies to mitigate these risks, tools to support the implementation of the recommended actions, and good practices to get inspired.

2.5.1. Key risks

- Lack of formal policies for managing risks associated with open access.
- Insufficient workflows for handling copyright, ethical, technical and financial challenges.

2.5.2. Mitigation strategies

- **Create a comprehensive open access policy:** Draft a policy that outlines legal, ethical, and technical guidelines for open access. Include clear procedures for rights management, community consultation, and user guidelines.
- **Establish a takedown procedure:** Develop a formal procedure for handling requests to remove or restrict access to certain items.
- **Adopt a risk assessment checklist:** Regularly assess risks and update policies to reflect changing needs, resources, or cultural sensitivities.

2.5.3. Tools and resources

- **Open access policy templates:** Available from Creative Commons or GLAM organizations, providing frameworks for developing open access policies.
 - Terms of Use Policy template by the 2024 Policy Template Working Group of the Creative Commons Open Culture Platform [coming soon]
 - GLAM-E Lab's [External Open Access Policies](#) document containing a model open access policy designed to be adopted by cultural institutions and organizations and posted on their publicly facing websites.
 - GLAM-E Lab's [Internal Open Access Policies](#) document setting out policies based on laws in the United States and United Kingdom that will help you identify works in your collection that may be good candidates for your open access programme.
- **Takedown policy template:** Customize a takedown policy template for handling requests to restrict access.
 - [Takedown policy template](#) by the 2024 Risk Management Working Group of the Creative Commons Open Culture Platform
 - [D-CRAFT's Writing a Takedown Policy](#)
- **Risk assessment template:** Use and adapt a risk assessment template to evaluate potential risks before making new materials publicly accessible.
 - [Risk assessment template](#) by the 2024 Risk Management Working Group of the Creative Commons Open Culture Platform.

2.5.4. Good practices

- [Open Access at The Met](#)
- [Open Access at the Cleveland Museum of Art](#)
- Wellcome Collection: [Policies and Plans](#)
- Wikimedia Foundation: [Open Access Policy](#) | [Licensing policy](#)
- [Yale University Open Access Policy](#)
- Bethel University Library: [SPARK Policies](#) | [Author Copyright Guidelines for SPARK](#) (Digital Commons Institutional Repository)
- [Open Access @ Rhodes University Library](#)
- [Griffith Open Research Statement](#)
- German Archaeological Institute: [Publication Strategy](#) | Data Protection Information
- University of Wyoming Libraries: [Digital Collection Policies](#)
- Emory University: [Open Access Policy](#)
- The Courtauld: [The Courtauld Gallery Collection Online](#) | [Copyright Strategy for Publishing The Witt Library](#)

For more inspiration, check the Open GLAM Survey [version 1.0](#) and [version 2.0](#), as well as the [Open GLAM Medium Publication](#).

2.6. Other risk areas

Some risks and concerns identified in the literature extend beyond the primary objectives of this Toolkit, which focuses on open access to digital cultural heritage collections. These include broader issues such as online privacy and security, especially in the wake of increased digital engagement during and after the COVID-19 pandemic, and safeguarding children and young people when engaging with digital heritage content. Below is a brief overview of these risks, along with pointers to relevant resources that can offer guidance and support.

2.6.1. Online privacy and security

As heritage organizations increasingly operate online, the COVID-19 pandemic has further underscored the need to safeguard privacy and secure digital information. Ensuring the privacy of individuals within the heritage sector and protecting sensitive data are critical as organizations adapt to remote and online workflows.

The guide [Online Privacy and Security](#) (2020), developed by [Naomi Korn Associates](#) for the National Lottery Heritage Fund's [Digital Skills for Heritage](#) initiative, addresses these challenges. It offers checklists, practical advice, and resources to help heritage organizations understand and manage their online activities securely.

2.6.2. Working safely online with children and young people

Digital heritage presents exciting opportunities for children and young people to explore, create, and connect. As GLAM organizations expand their online engagement with communities, it is essential to prioritize the safety of younger audiences, regardless of whether the institution explicitly serves youth.

The guide [Working with Children and Young People Online](#) (2020), produced by [Childnet International](#) for the National Lottery Heritage Fund's [Digital Skills for Heritage](#) initiative, provides practical advice for managing online activities safely. It highlights strategies to mitigate risks and foster safe and creative digital interactions for young audiences.

3. Use cases

This section captures potential risks associated with sharing digital collections under open licenses or public domain tools. Each use case highlights real-world scenarios faced by GLAM organizations, featuring key personas, underlying causes, and potential impacts. Each use case is structured as follows:

[Persona] doesn't make [X type] collection or work open access, because [Y] will happen and that has an impact on [Z].

These use cases are derived from responses to open-ended questions in the Working Group's online survey on risk management in open access to digital collections. A variety of personas are included to represent the diverse roles involved in managing digital collections within GLAM organizations, and sharing them openly with the public.

The use cases are listed below by collection type.

3.1. All types of works/collections

⚠ Cultural heritage professionals don't make certain digital collections open access because of copyright ambiguity. If materials are made available without proper copyright checks, there's a risk of copyright infringement or misuse by the public, which can impact legal compliance and damage the reputation of the institution.

⚠ Decision makers don't make certain digital collections open access, because inaccurate licensing or uncertainties in copyright ownership could lead to privacy breaches or unauthorised sharing or misuse. This would impact the institution's ability to safeguard sensitive cultural materials and comply with contractual obligations, especially in cases involving Indigenous communities.

⚠ Library administrators don't make certain collections open access, because many of them have not been digitised. This delays public access and impacts the institution's ability to share resources effectively in the digital age.

⚠ Collection managers don't make certain items open access, because there is a lack of clear procedural workflows for obtaining permissions. This can result in legal and copyright issues, impacting the institution's ability to share its full range of collections effectively.

⚠ Curators at smaller, understaffed institutions don't make all their collections open access, because they lack the resources and trained personnel to manage rights and permissions accurately. This could lead to mismanagement of copyright information, affecting the institution's credibility and the quality of its publicly accessible collections.

⚠ Institutional decision makers don't make collections open access, because there is no unified policy or clear leadership direction. This results in inconsistent approaches to monetization and accessibility, impacting the institution's ability to maintain a cohesive strategy for sharing and protecting its collections.

3.2. Indigenous collections

⚠ Curators don't make Indigenous collections open access, because there is a risk of unethical sharing without proper decolonial protocols. This could lead to cultural exploitation and disrespect towards the communities, undermining trust and collaboration with Indigenous partners.

3.3. Photographs and images

⚠ Institution managers don't make certain heritage photographs open access, because of potential self-image rights' violations and misuse for commercial purposes. This can harm the dignity of the individuals depicted, and damage the institution's commitment to ethical and respectful representation.

⚠ Repository managers don't make high-resolution image collections fully open access, because unrestricted use could lead to commercial exploitation without compensation. This undermines potential revenue from licensing agreements with partner picture agencies, affecting the institution's funding and financial viability.

⚠ Institution administrators don't make all digital assets open access, because without control over usage, there's a risk of images being used in commercial products. This affects revenue streams from licensing, which may be crucial for funding preservation and digitization projects.

3.4. Audio and video materials

⚠ Digital collection managers don't make certain culturally sensitive audio and video materials open access, because there's a risk of them being exploited for commercial purposes without permission. This could disrespect the cultural heritage of the content and negatively affect the institution's relationships with content owners and the public.

3.5. Publications

⚠ Publishers don't make all their publications open access, because this would lead to a significant loss of revenue from hard copy sales. This loss impacts the financial sustainability of the journals, especially since they do not charge author processing fees to offset costs.

3.6. Datasets

⚠ Data managers don't make certain open datasets available without restrictions, because the information could be misused for illicit excavations or fuel conspiracy theories. This misuse can lead to cultural misinformation and damage public trust in scholarly research.

⚠ Research data managers don't make datasets open access, because inadequate or technically misleading data may spread rapidly and be misinterpreted. This can negatively impact the credibility of the research institution and result in difficulties securing future funding.

⚠ Digital archivists don't make raw datasets open access, because unrefined data might contain sensitive personal or institutional information. This could lead to security breaches or exploitation of system vulnerabilities, affecting the safety and privacy of both the institution and its stakeholders.

4. Related resources

Below is a list of indicative resources which can help with understanding the open GLAM landscape and identifying risks and strategies for GLAM organisations in opening up their collections.

Anon (2019) [Enhancing Access to and Sharing of Data: Reconciling Risks and Benefits for Data Re-use Across Societies](#). Paris, France: Organisation for Economic Co-Operation and Development.

Candela G, Gabriëls N, Chambers S, Dobрева M, Ames S, Ferriter M et al. [A checklist to publish collections as data in GLAM institutions](#). *Global Knowledge, Memory and Communication*. 2023 Nov 9. Epub 2023 Nov 9. doi: 10.1108/GKMC-06-2023-0195.

Creative Commons (2024) CC Certificate Course - [Unit 5.2. Opportunities and Challenges of Open Culture](#).

Deazley, R., Patterson, K., Stobo, V. (2017) [Digitising the Edwin Morgan Scrapbooks: Digitisation and Risk](#).

Fraser, J. (2021) [Beyond Copyright: the Ethics of Open Sharing](#), *Creative Commons: We Like to Share Medium Publication*.

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